

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C. 20554

In the Matter of)
)
Advanced Television Systems) MB Docket No. 87-268
and Their Impact upon the)
Existing Television Broadcast Service)

To: The Commission

COMMENTS

Ramar Communications II, Ltd. (“Ramar”), the licensee of KJTV-TV, and the permittee of KJTV-DT, Lubbock, Texas (Facility ID No. 55031) (the “Station”), by its attorneys, hereby submits its comments in response to the Seventh Further Notice of Proposed Rule Making (“FNPRM”) issued by the Commission on October 20, 2006 in the above-captioned proceeding (FCC 06-150).

The FNPRM proposes a new DTV Table of Allotments that provides all eligible stations with channels for DTV operation following the DTV transition. The FNPRM invites corrective comments regarding any inaccuracies in the proposed DTV Table of Allotments, including Appendix B thereto. FNPRM at 7, para. 16. These comments are intended to correct the technical information for the Station included at Appendix B to the proposed DTV Table of Allotments.

The Station’s original maximized DTV construction permit authorized the operation of the Station at 323 kW at 603 meters HAAT. *See* FCC File No. BPCDT-19991020ABT. The technical information for the Station that appears in Appendix B, including the transmitter site location, reflects the facilities authorized in that initial DTV construction permit. Ramar subsequently determined that the Station’s existing tower could not support

the weight and wind load characteristics of both the KJTV-TV analog and KJTV-DT full power digital antenna due to the tower's design characteristics and the presence of internal rust. As a consequence, Lamar applied for and was granted a modified DTV construction permit for the Station that specified operation of the Station from a new tower. *See* FCC File No. BMPCDT-20041115ACT. The overall height above ground of the tower specified in that modified construction permit was 336.8 meters.

As a result of changed financial circumstances, Lamar conducted a thorough cost/benefit analysis of the construction of its new authorized tower and determined that it would not be economically prudent to construct that tower to its authorized 336.8 meters height. Specifically, Lamar concluded that decreasing the overall height above ground of the tower to 289.6 meters would reduce the total tower construction costs by approximately \$850,000, but would only decrease the Station's 41 dBu population coverage by approximately 1.34%. Accordingly, Lamar filed on December 13, 2006 an application to further modify its DTV construction permit for the Station, which application has been granted. *See* FCC File No. BMPCDT-20061213AFW. That construction permit specifies operation of the Station at 1000 kW at 273.9 meters HAAT.

Ramar requests that the technical information for the Station set forth in Appendix B to the proposed DTV Table of Allotments be changed to reflect the facilities set forth in FCC File No. BMPCDT-20061213AFW, as follows:

ERP:	1000 kW
HAAT:	273.9 meters
Latitude:	33-30-8 N
Longitude:	101-52-20 W

In this regard, attached hereto is an Engineering Statement demonstrating that operation of the Station with its presently licensed digital facilities complies with the FCC's 0.1% interference requirement. FNPRM at 28-29.

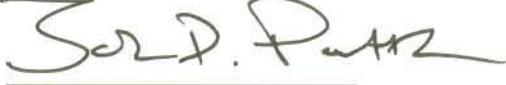
Conforming corrections should also be made in Appendix B with respect to the Station's Antenna ID, Area, Population and Percent Interference Received. The remaining information for the Station set forth in Appendix B (Facility ID, State and City, NTSC Channel and DTV Channel) is correct.

For the reasons set forth above, Ramar hereby requests that Appendix B to the DTV Table of Allotments proposed by the FNPRM be revised as described herein to correctly reflect the Station's authorized digital operations.

Respectfully submitted,

RAMAR COMMUNICATIONS II, LTD.

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January 25, 2007

Its Attorneys

Engineering Statement

Prepared by Guy Smith RF Engineer for Ramar Communications
In connection with modification of KJTV-DT Certification

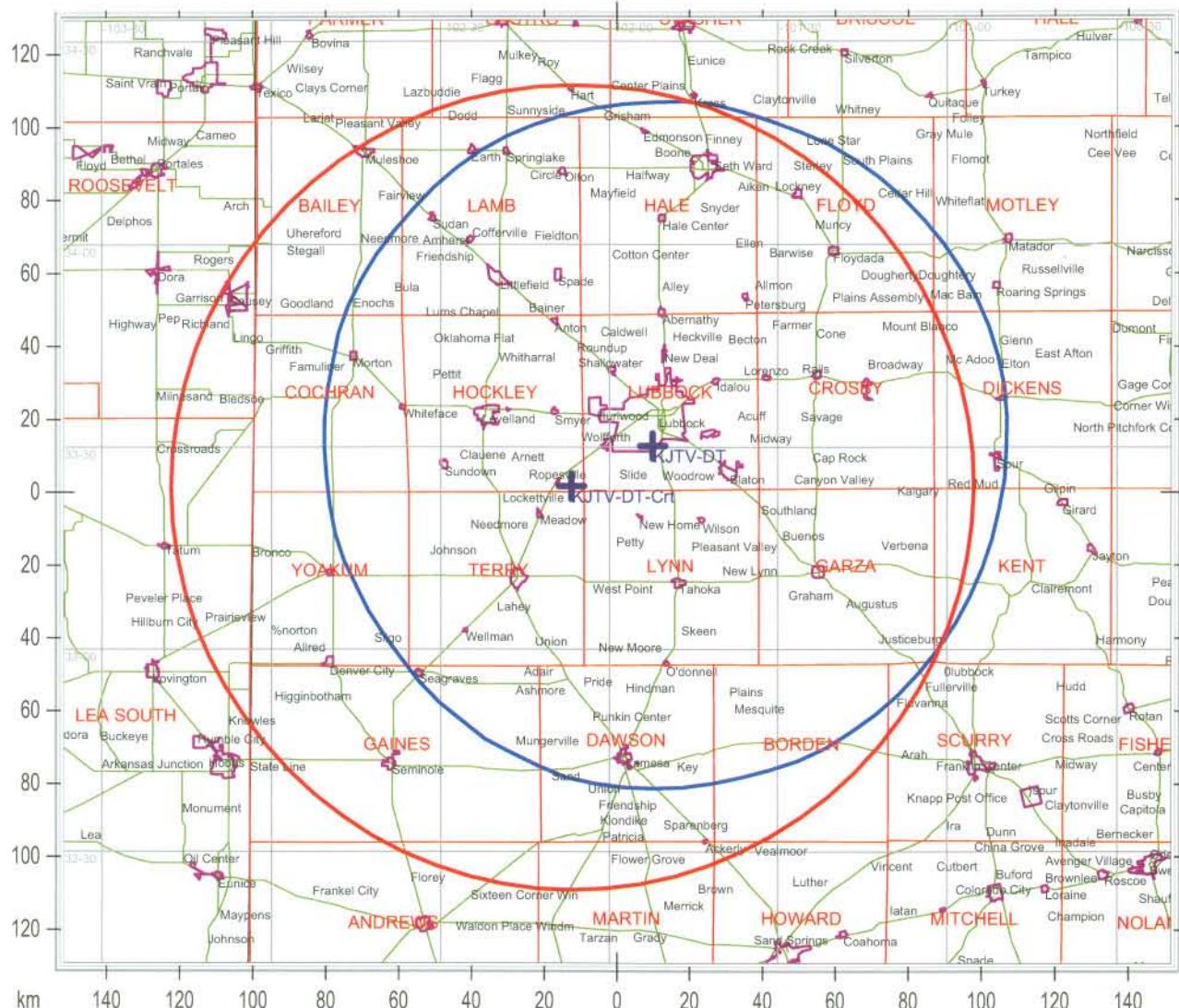
The original certification for KJTV-DT was based on maximized facilities using a 600 meter tower planned as a joint venture by all the Lubbock DTV stations. When the sponsor of the new tower was unable to obtain commitments from most of the other area stations, Ramar determined that the cost of such a tower could no longer be justified. Ramar consequently, constructed a tower, about 300 meters in height, on land already owned by Ramar.

The new service contour, and the contour originally certified are plotted on the following page with the originally certified 41 dBu contour in red and the new 41 dBu contour in blue. A relatively small area is added to the KJTV-DT 41 dBu contour, containing a total of 2,702 people according to the year 2000 census. The population served by KJTV-DT from the shorter tower is 377,581, or 26,702 fewer than from the originally certified site.

The interference analysis on pages 3 and 4 of this statement demonstrates that no existing station will be adversely affected, and only one proposed station, BNPTTL-20030831CAH, Facility ID # 129868, a CP for channel 36 at Lubbock is predicted to receive any interference. Ramar and Venture Communications are presently negotiating an agreement to provide space for that station on the KJTV-DT tower. This would eliminate the interference if Venture increased ERP to approximately 50 kW, which appears to be entirely feasible based on a cursory analysis.

Page 5 of this statement is a closeup of the area gained by KJTV-DT.

KJTV-DT Modification



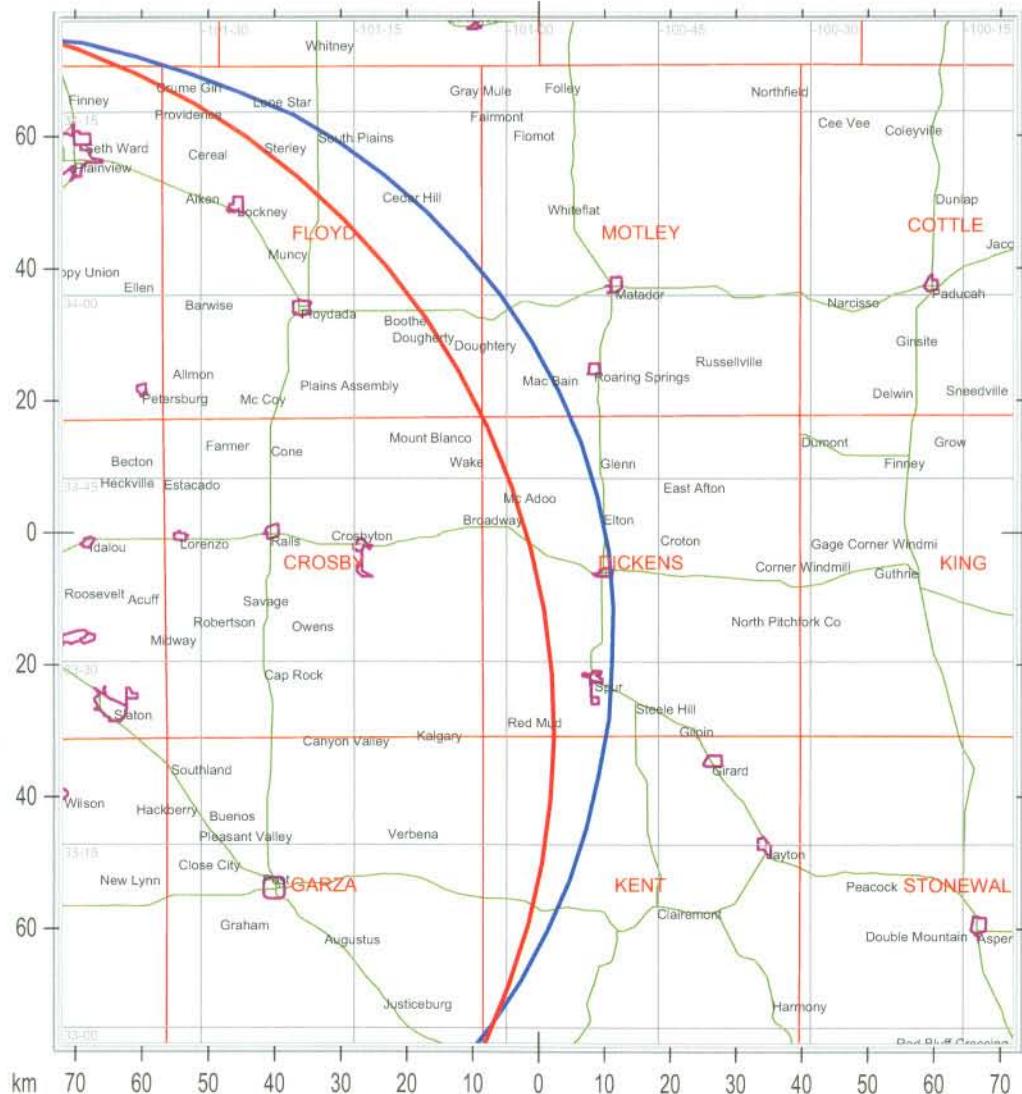
— County Borders — State Borders — City Borders — Highways — Lat/Lon Grid

Summary of Channel 35: Lat: 33-30-08.0 N Lon: 101-52-20.0 W ERP: 1000.000 kW ComStudy 2.2 RadioSoft

CallSign	Fac ID	ARN	City	Class	Type	ERP	Sep	Ty	Status	Bearing	Dist	Prot	Clearan	D/U	Rx Gain	Rx F/B	Zone	Band	Ch#	Adj	Matrix	Svc Cor	Svc dBuild	ContInt	dBu	Old Pop	New Po	Total Po	Old Pop	New Po	Total Po	
NEW	131094	BNPTTILUBBOILP	NTSAPP			20.000	D/M	Clean	207.78	2.0	106	-104.0	-43	0.0	6.0	0	UHF	42 +	T+7	LR	F(50,5074	-	-	0.0%	0.0%	208279	208279	208279				
NEW	129740	BNPTTILUBBOILP	NTSCP			0.005	D/M	Clean	7.27	2.6	106	-103.4	-33	0.0	6.0	0	UHF	49 Z	T+14	LR	F(50,5074	-	-	N/C	N/C	N/C	N/C	N/C	N/C	N/C		
NEW	130367	BNPTTILUBBOILP	NTSAPP			50.000	D/M	Clean	7.27	2.6	106	-103.4	-33	0.0	6.0	0	UHF	49 -	T+14	LR	F(50,5074	-	-	0.0%	0.0%	245681	245681	245681				
NEW	127883	BNPTTILUBBOILP	NTSAPP			10.000	D/M	Clean	7.27	2.6	106	-103.4	-43	0.0	6.0	0	UHF	42 -	T+7	LR	F(50,5074	-	-	0.0%	0.0%	229628	229628	229628				
KAMC	40820	BLCT18LUBBOINTSC	LIC			2000.00D/M		Clean	55.65	2.7	106	-103.3	-35	0.0	6.0	2	UHF	28 Z	T-7	LR	F(50,5064	-	-	0.0%	0.0%	316823	316823	316823				
K38HP	129688	BLTTL2LUBBOILP	NTSLIC			15.000	D/M	Clean	55.11	2.7	106	-103.3	-34	0.0	6.0	0	UHF	38 -	T+3	LR	F(50,5074	-	-	0.0%	0.0%	209321	209321	209321				
K35EM	1238	BLTT19QUITACLP	NTSLIC			1.050	C/M	Clean	34.59	121.6	245	-101.8	34	0.0	6.0	0	UHF	35	Co	LR	F(50,5074	F(50,1040	0.0%	0.0%	537	537	537					
NEW	128846	BNPTTILUBBOILP	NTSAPP			20.000	D/M	Clean	13.56	9.4	106	-96.6	-31	0.0	6.0	0	UHF	50 -	T+15	LR	F(50,5074	-	-	0.0%	0.0%	119067	119067	119067				
K67HQ	129715	BDISTTLUBBOILP	NTSAPP			10.000	D/M	Clean	13.56	9.4	106	-96.6	-34	0.0	6.0	0	UHF	31 +	T-4	LR	F(50,5074	-	-	0.0%	0.0%	210289	210289	210289				
K35CG	33717	BLTT19BOVINALP	NTSLIC			0.900	C/M	Clean	323.02	151.5	245	-70.2	34	0.0	6.0	0	UHF	35	Co	LR	F(50,5074	F(50,1040	0.0%	0.0%	2038	2038	2038					
NEW	130639	BNPTTIBROWNLP	NTSCP			20.800	D/M	Clean	226.89	53.1	106	-52.9	-31	0.0	6.0	0	UHF	50 Z	T+15	LR	F(50,5074	-	-	0.0%	0.0%	10927	10927	10927				
NEW	129868	BNPTTILUBBOILP	NTSCP			10.000	C/M	Interf	7.27	2.6	245	-49.0	-17	0.0	6.0	0	UHF	36 -	A+1	LR	F(50,5074	F(50,1091	0.0%	17.9%	229628	229628	188430					
KIDB-C	53545	BPTTA2SWEETA	NTSCCP			8.800	C/M	Clean	128.32	190.3	245	-46.9	34	0.0	6.0	0	UHF	35	Co	LR	F(50,5074	F(50,1040	0.0%	0.0%	13949	13949	13949					
K35EK	53545	BLTT19SWEETA	NTSLIC			7.030	C/M	Clean	128.31	190.3	245	-45.3	34	0.0	6.0	0	UHF	35	Co	LR	F(50,5074	F(50,1040	0.0%	0.0%	13212	13212	13212					
NEW	129730	BNPTTILITTLEILP	NTSAPP			16.600	D/M	Clean	320.90	67.4	106	-38.6	-43	0.0	6.0	0	UHF	42 +	T+7	LR	F(50,5074	-	-	0.0%	0.0%	8051	8051	8051				
NEW	125723	BNPTTIPLAINVLP	NTSCP			10.000	D/M	Clean	359.27	79.3	106	-26.7	-34	0.0	6.0	0	UHF	31 Z	T-4	LR	F(50,5074	-	-	0.0%	0.0%	20460	20460	20460				
	126138	BNPTTIPLAINVLP	NTSAPP			10.000	D/M	Bad Da	359.27	79.3	106	-26.7	-31	0.0	6.0	0	UHF	50 Z	T+15	LR	F(50,5074	-	-	N/C	N/C	N/C	N/C	N/C	N/C	N/C		
NEW	129712	BNPTTIPLAINVLP	NTSAPP			6.000	D/M	Clean	10.56	80.2	106	-25.8	-31	0.0	6.0	0	UHF	50 +	T+15	LR	F(50,5074	-	-	0.0%	0.0%	27578	27578	27578				
NEW	130552	BNPTTIPLAINVLP	NTSAPP			20.800	D/M	Clean	10.26	81.2	106	-24.8	-31	0.0	6.0	0	UHF	50 +	T+15	LR	F(50,5074	-	-	0.0%	0.0%	28207	28207	28207				
K42ES	55050	BLTT20MATADLP	NTSLIC			0.550	D/M	Clean	58.72	103.4	106	-2.6	-43	0.0	6.0	0	UHF	42 Z	T+7	LR	F(50,5074	-	-	0.0%	0.0%	737	737	737				
K35CG	33717	BDFCDBOVINALP	DTVCP			0.005	M	Clean	323.02	151.5	245	-	15	14.0	10.0	0	UHF	35	Co	LR	F(50,9051	-	-	0.0%	0.0%	567	567	567				
KJTV	55031	BLCT19LUBBOINTSC	LIC			3720.00D/M		Callsign	90.00	0.0	106	0.0	-14	0.0	6.0	2	UHF	34 -	A-1	LR	F(50,5064	-	-	N/C	N/C	N/C	N/C	N/C	N/C	N/C		
KJTV-C	55033	BLTTA2LUBBOIA	NTSLIC			14.600	D/M	Callsign	90.00	0.0	106	0.0	-30	0.0	6.0	0	UHF	32 Z	T-3	LR	F(50,5074	-	-	N/C	N/C	N/C	N/C	N/C	N/C	N/C		
KJTV-C	55033	BPTTA2LUBBOIA	NTSCAPP			30.700	D/M	Callsign	90.00	0.0	106	0.0	-30	0.0	6.0	0	UHF	32 Z	T-3	LR	F(50,5074	-	-	N/C	N/C	N/C	N/C	N/C	N/C	N/C		
KJTV*	55031	DTV ALLUBBOODTV	LIC			121.000D/M		Callsign	90.00	0.0	224	0.0	15	14.0	10.0	2	UHF	35	Co	LR	F(50,9041	-	-	N/C	N/C	N/C	N/C	N/C	N/C	N/C		
KJTV	55031	BPCT2LUBBOINTSC	APP			5000.00D/M		Callsign	195.06	18.9	106	0.0	-14	0.0	6.0	2	UHF	34 -	A-1	LR	F(50,5064	-	-	N/C	N/C	N/C	N/C	N/C	N/C	N/C		
K34EZ	55509	BDFCDFORESLP	DTVCP			1.000	M	Clean	311.46	225.6	245	-	-28	14.0	10.0	0	UHF	34	A-1	LR	F(50,9051	-	-	0.0%	0.0%	452	452	452				
KJTV-D	555031	BDSTA2LUBBOODTV	STLIC			0.910	D/M	Callsign	90.00	0.0	197	0.0	15	14.0	10.0	0	UHF	35	Co	LR	F(50,9041	-	-	N/C	N/C	N/C	N/C	N/C	N/C	N/C		
KJTV-D	555031	BMDSTLUBBOODTV	STLIC			58.000	D/M	Callsign	90.00	0.0	197	0.0	15	14.0	10.0	0	UHF	35	Co	LR	F(50,9041	-	-	N/C	N/C	N/C	N/C	N/C	N/C	N/C		
KJTV-D	555031	BMPCDLUBBOODTV	CP MO			1000.00D/M		Callsign	90.00	0.0	224	0.0	15	14.0	10.0	2	UHF	35	Co	LR	F(50,9041	-	-	N/C	N/C	N/C	N/C	N/C	N/C	N/C		
KJTV-D	555031	BMPCDLUBBOODTV	APP			1000.00D/M		Callsign	90.00	0.0	224	0.0	15	14.0	10.0	2	UHF	35	Co	LR	F(50,9041	-	-	N/C	N/C	N/C	N/C	N/C	N/C	N/C		
NEW	168089	BDCCDLUBBOILP	DTVAPP			15.000	M	Clean	90.00	0.0	245	-	-28	14.0	10.0	0	UHF	34	T	A-1	LR	F(50,9051	-	-	0.0%	0.0%	288513	288513	288513			
NEW	168103	BDCCCDLUBBOILP	DTVAPP			0.300	M	Clean	55.30	183.3	245	-	-28	14.0	10.0	0	UHF	34	A-1	LR	F(50,9051	-	-	0.0%	0.0%	7642	7642	7642				
K35GU	130964	BDFCDRUIDOSLP	DTVCP			8.300	M	Clean	269.35	362.8	245	-	15	14.0	10.0	0	UHF	35	Co	LR	F(50,9051	-	-	0.0%	0.0%	63636	63636	63636				

KJBO-L7670	BDFCDWICHITLP DTVCP	0.062	M	Clean	80.96	311.1	245	-	15	14.0	10.0	0	UHF	35	Co	LR	F(50,9051	-	-	0.0%	0.0%	115753	115753	115753
KSGD-L53523	BLTTL2SEMINLP NTSLIC	0.870	D/M	Clean	221.67	112.1	106	6.1	-33	0.0	6.0	0	UHF	49+	T+14	LR	F(50,5074	-	-	0.0%	0.0%	7166	7166	7166
KSGD-L53523	BPPTL2SEMINLP NTSCP	0.870	D/M	Clean	220.44	113.3	106	7.3	-33	0.0	6.0	0	UHF	49+	T+14	LR	F(50,5074	-	-	0.0%	0.0%	8169	8169	8169
K42ET 55048	BLTT20SNYDEILP NTSLIC	9.310	D/M	Clean	132.50	121.6	106	15.6	-43	0.0	6.0	0	UHF	42-	T+7	LR	F(50,5074	-	-	0.0%	0.0%	14414	14414	14414
K26DW 53521	BLTT20SNYDEILP NTSLIC	9.310	D/M	Clean	132.50	121.6	106	15.6	-33	0.0	6.0	0	UHF	49-	T+14	LR	F(50,5074	-	-	0.0%	0.0%	14351	14351	14351
K42ET 55048	BSTA2CSNYDEILP NTSLIC	8.700	D/M	Clean	132.50	121.6	106	15.6	-43	0.0	6.0	0	UHF	42-	T+7	LR	F(50,5074	-	-	0.0%	0.0%	14485	14485	14485
K35FP 68710	BLTT20TUCUMLP NTSLIC	0.660	C/M	Clean	317.89	247.3	245	34.5	34	0.0	6.0	0	UHF	35	Co	LR	F(50,5074	F(50,1040	0.0%	0.0%	6977	6977	6977	
K56GG 5843	BLTT20HOBBSLP NTSLIC	10.000	D/M	Clean	235.89	140.6	106	34.6	-32	0.0	6.0	0	UHF	27Z	T-8	LR	F(50,5074	-	-	0.0%	0.0%	28716	28716	28716
K54GA 5839	BLTT20HOBBSLP NTSLIC	10.000	D/M	Clean	235.89	140.6	106	34.6	-31	0.0	6.0	0	UHF	50Z	T+15	LR	F(50,5074	-	-	0.0%	0.0%	22939	22939	22939
126956 BNPTT1HOBBSLP NTSAPP	10.000 D/M	Clean	233.14	143.1	106	37.1	-31	0.0	6.0	0	UHF	50Z	T+15	LR	F(50,5074	-	-	0.0%	0.0%	30632	30632	30632		
NEW 128305 BNPTT1BIG SPLP NTSAPP	140.000D/M	Clean	163.87	144.4	106	38.4	-31	0.0	6.0	0	UHF	50+	T+15	LR	F(50,5074	-	-	0.0%	0.0%	31010	31010	31010		
NEW 128133 BNPTT1HOBBSLP NTSAPP	5.000 D/M	Clean	231.75	147.7	106	41.7	-31	0.0	6.0	0	UHF	50Z	T+15	LR	F(50,5074	-	-	0.0%	0.0%	25928	25928	25928		
127004 BNPTT1HOBBSLP NTSAPP	5.000 D/M	Clean	231.75	147.7	106	41.7	-31	0.0	6.0	0	UHF	50Z	T+15	LR	F(50,5074	-	-	0.0%	0.0%	25928	25928	25928		
NEW 130386 BNPTT1HOBBSLP NTSAPP	12.400 D/M	Clean	236.19	147.8	106	41.8	-31	0.0	6.0	0	UHF	50-	T+15	LR	F(50,5074	-	-	0.0%	0.0%	35997	35997	35997		
NEW 130513 BNPTT1HOBBSLP NTSAPP	12.400 D/M	Clean	236.19	147.8	106	41.8	-33	0.0	6.0	0	UHF	49+	T+14	LR	F(50,5074	-	-	0.0%	0.0%	37037	37037	37037		
NEW 129547 BNPTT1BIG SPLP NTSAPP	10.000 D/M	Clean	164.53	148.0	106	42.0	-31	0.0	6.0	0	UHF	50+	T+15	LR	F(50,5074	-	-	0.0%	0.0%	25332	25332	25332		
NEW 128245 BNPTT1HOBBSLP NTSAPP	2.700 D/M	Clean	232.82	150.1	106	44.1	-31	0.0	6.0	0	UHF	50	T+15	LR	F(50,5074	-	-	0.0%	0.0%	32808	32808	32808		
NEW 129023 BNPTT1HOBBSLP NTSAPP	20.000 D/M	Clean	232.82	150.1	106	44.1	-31	0.0	6.0	0	UHF	50-	T+15	LR	F(50,5074	-	-	0.0%	0.0%	36804	36804	36804		
K49BY 48551	BPPT20CLOVISLP NTSCP	17.000 D/M	Clean	303.84	151.2	106	45.2	-33	0.0	6.0	0	UHF	49	T+14	LR	F(50,5074	-	-	0.0%	0.0%	55121	55121	55121	
NEW 130266 BNPTT1HEREFLP NTSAPP	150.000D/M	Clean	341.87	153.7	106	47.7	-43	0.0	6.0	0	UHF	42-	T+7	LR	F(50,5074	-	-	0.0%	0.0%	17698	17698	17698		
K49BY 48551	BLTT19CLOVISLP NTSLIC	7.900	D/M	N/C	310.60	161.5	106	55.5	-33	0.0	6.0	0	UHF	49	T+14	LR	F(50,5074	-	-	N/C	N/C	N/C	N/C	N/C
K43BU 40448	BLTTL1CLOVISLP NTSLIC	7.900	D/M	N/C	310.58	161.5	106	55.5	-43	0.0	6.0	0	UHF	43	T+8	LR	F(50,5074	-	-	N/C	N/C	N/C	N/C	N/C
NEW 130007 BNPTT1MIDLANLP NTSCP	50.000 D/M	N/C	193.87	166.5	106	60.5	-31	0.0	6.0	0	UHF	50-	T+15	LR	F(50,5074	-	-	N/C	N/C	N/C	N/C	N/C		
KMLM 53541	BLCT20ODESSNTSC LIC	302.000D/M	N/C	194.05	166.5	106	60.5	-43	0.0	6.0	2	UHF	42Z	T+7	LR	F(50,5064	-	-	N/C	N/C	N/C	N/C	N/C	
K49CD 64989	BLTTL1ODESSLP NTSLIC	1.720 D/M	N/C	186.09	172.6	106	66.6	-33	0.0	6.0	0	UHF	49+	T+14	LR	F(50,5074	-	-	N/C	N/C	N/C	N/C	N/C	
K49CD 64989	BMJPT1ODESSLP NTSAPP	30.600 D/M	N/C	186.09	172.6	106	66.6	-33	0.0	6.0	0	UHF	49Z	T+14	LR	F(50,5074	-	-	N/C	N/C	N/C	N/C	N/C	
125221 BNPTT1AMARILLP NTSAPP	18.070 D/M	N/C	358.78	176.1	106	70.1	-32	0.0	6.0	0	UHF	27	T-8	LR	F(50,5074	-	-	N/C	N/C	N/C	N/C	N/C		
NEW 131114 BNPTT1SWEETLP NTSAPP	15.000 D/M	N/C	130.32	177.2	106	71.2	-33	0.0	6.0	0	UHF	49Z	T+14	LR	F(50,5074	-	-	N/C	N/C	N/C	N/C	N/C		
K49AQ 17262	BLTT19CLAREILP NTSLIC	1.010 D/M	N/C	28.83	178.2	106	72.2	-33	0.0	6.0	0	UHF	49	T+14	LR	F(50,5074	-	-	N/C	N/C	N/C	N/C	N/C	
K39GJ 126139 BLTTL2SWEETLP NTSLIC	10.000 D/M	N/C	128.43	180.1	106	74.1	-25	0.0	6.0	0	UHF	39Z	T+4	LR	F(50,5074	-	-	N/C	N/C	N/C	N/C	N/C		
125635 BNPTT1SWEETLP NTSAPP	10.000 D/M	N/C	128.43	180.1	106	74.1	-33	0.0	6.0	0	UHF	49	T+14	LR	F(50,5074	-	-	N/C	N/C	N/C	N/C	N/C		
K50CQ 55391	BLTT19CHILDRLP NTSLIC	0.970 D/M	N/C	55.21	183.4	106	77.4	-31	0.0	6.0	0	UHF	50	T+15	LR	F(50,5074	-	-	N/C	N/C	N/C	N/C	N/C	
K36CC 40452	BLTTL2TULIA LP NTSLIC	0.928 C/M	Clear	6.00	115.7	245	78.5	-17	0.0	6.0	0	UHF	36Z	A+1	LR	F(50,5074	F(50,1091	N/C	N/C	N/C	N/C	N/C	N/C	
KJBO-L7670	BLTTL1WICHITLP NTSLIC	10.500 C/M	Clear	80.96	311.1	245	78.9	34	0.0	6.0	0	UHF	35	Co	LR	F(50,5074	F(50,1040	N/C	N/C	N/C	N/C	N/C	N/C	
NEW 128490 BNPTT1AMARILLP NTSAPP	20.000 D/M	N/C	357.69	185.9	106	79.9	-32	0.0	6.0	0	UHF	27+	T-8	LR	F(50,5074	-	-	N/C	N/C	N/C	N/C	N/C		
K42AL 8719	BLTT19MEMPHLP NTSLIC	0.815 D/M	N/C	38.26	186.0	106	80.0	-43	0.0	6.0	0	UHF	42	T+7	LR	F(50,5074	-	-	N/C	N/C	N/C	N/C	N/C	

Population Added - KJTV-DT Modification



Red - Certified 41dBu Blue New 41 dBu

County Borders State Borders City Borders Highways Lat/Lon Grid